

## Ryland, Renea

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**From:** Honker, William  
**Sent:** Thursday, May 04, 2017 8:32 AM  
**To:** Ryland, Renea; Harrison, Ben  
**Subject:** FW: Georgia-Pacific, LLC Crossett Paper Operations, Draft NPDES Permit # AR0001210  
**Attachments:** 5-3-17 Ltr re EPA Objection GP Draft NPDES Permit - FINAL.pdf

Bill

William K. Honker, P.E.  
Director, Water Division  
EPA Region 6  
1445 Ross Ave., Suite 1200  
Dallas, TX 75202  
214-665-3187

**From:** Dwyer, Stacey  
**Sent:** Thursday, May 04, 2017 7:46 AM  
**To:** Honker, William <honker.william@epa.gov>  
**Cc:** Garcia, David <Garcia.David@epa.gov>; Payne, James <payne.james@epa.gov>; Moncrieffe, Marcia <Moncrieffe.Marcia@epa.gov>  
**Subject:** FW: Georgia-Pacific, LLC Crossett Paper Operations, Draft NPDES Permit # AR0001210

FYI.

**From:** Burrell, Monica  
**Sent:** Wednesday, May 03, 2017 6:29 PM  
**To:** Dwyer, Stacey <Dwyer.Stacey@epa.gov>; Restivo, Angela <Restivo.Angela@epa.gov>; Ryland, Renea <Ryland.Renea@epa.gov>  
**Subject:** FW: Georgia-Pacific, LLC Crossett Paper Operations, Draft NPDES Permit # AR0001210

*FYI*

**From:** Van Dalen, Corinne J [<mailto:cvandale@tulane.edu>]  
**Sent:** Wednesday, May 03, 2017 6:20 PM  
**To:** Coleman, Sam <Coleman.Sam@epa.gov>  
**Cc:** Gray, David <gray.david@epa.gov>; Honker, Williams <Honker.williams@epa.gov>; Burrell, Monica <Burrell.Monica@epa.gov>; Rosborough, Evelyn <rosborough.evelyn@epa.gov>  
**Subject:** Georgia-Pacific, LLC Crossett Paper Operations, Draft NPDES Permit # AR0001210

Dear Mr. Coleman:

On behalf of the Ouachita Riverkeeper and Louisiana Environmental Action Network, I am submitting the attached letter urging EPA Region 6 to assert its authority under 33 U.S.C. § 402(d)(2) and object to the draft National Pollutant Discharge Elimination System Permit No. AR0001210 that the Arkansas Department of Environmental Quality proposes to issue to Georgia-Pacific, LLC.

Sincerely,

Corinne Van Dalen

Corinne Van Dalen, Supervising Attorney  
Tulane Environmental Law Clinic  
6329 Freret Street  
New Orleans, LA 70118  
504-862-8818  
[cvandale@tulane.edu](mailto:cvandale@tulane.edu)

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Tulane Environmental Law Clinic  
6329 Freret Street  
New Orleans, LA 70118  
504-862-8818  
[cvandale@tulane.edu](mailto:cvandale@tulane.edu)

TULANE ENVIRONMENTAL LAW CLINIC

May 3, 2017

Samuel Coleman, P.E., Acting Regional Administrator  
U.S. EPA REGION 6  
1445 Ross Avenue, Suite 1200  
Mail Code: 6RA  
Dallas, TX 75202-2733

Re: Georgia-Pacific, LLC Crossett Paper Operations, Draft NPDES Permit #  
AR0001210

Dear Mr. Coleman:

On behalf of the Ouachita Riverkeeper<sup>1</sup> and Louisiana Environmental Action Network ("LEAN"),<sup>2</sup> we urge EPA Region 6 to assert its authority under 33 U.S.C. § 402(d)(2) and object to the draft National Pollutant Discharge Elimination System ("NPDES") Permit No. AR0001210 ("Draft Permit") that the Arkansas Department of Environmental Quality proposes to issue to Georgia-Pacific, LLC.

### *Summary*

Under 33 U.S.C. § 402(d)(2), "No permit shall issue . . . if the Administrator within ninety days of the date of transmittal of the proposed permit by the State objects in writing to the issuance of such permit as being outside the guidelines and requirements of this chapter." ADEQ submitted the Draft Permit for review by EPA Region 6 under 33 U.S.C. § 402(d)(1) on February 6, 2017. EPA's 90-day review period ends on May 7, 2017. EPA should object to the Draft Permit because it violates Clean Water Act standards and requirements because the permit misidentifies external outfalls—i.e., the points at which Georgia-Pacific and the City of Crossett discharge to Coffee Creek. The Draft Permit includes one external outfall for all discharges. That outfall is located at least four miles below the discharge point for Georgia-Pacific and almost two miles downstream of the City's discharges. Instead of recognizing that Coffee Creek is a water of

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<sup>1</sup> Ouachita Riverkeeper is a non-profit corporation in Arkansas and Louisiana. It is comprised of citizens in Arkansas and Louisiana concerned about the quality and use of the Ouachita River and its tributaries. Ouachita Riverkeeper's purpose is to ensure that the people who use the Ouachita River enjoy a clean and safe environment and protect that environment for future generations. Ouachita Riverkeeper has members who live, work, or recreate around the Ouachita River in both Arkansas and Louisiana.

<sup>2</sup> LEAN is a non-profit corporation organized under the laws of the State of Louisiana. LEAN serves as an umbrella organization for environmental and citizen groups. LEAN's purpose includes preserving and protecting the state's land, air, water, and other natural resources and protecting its members and other residents of the state from threats caused by pollution. LEAN has an interest in protecting the Ouachita River, which flows into Louisiana several miles downstream of Crossett, Arkansas.